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Comments on Draft DCID 1/16

Many of the following comments are also applicable to the present DCID 1/16.

General

The directive needs to be rewritten in a straightforward, concise manner to specify precisely the minimum security requirements for processing intelligence information. Requirements that can be waived at the discretion of the NFIB member should be identified. Suggested procedures or security controls in the attachment should be labeled as either guidance or mandatory security requirements.

Specific

Page 1 - "Minimum security requirements are hereby established". What minimum requirements?

The only minimum requirement is personnel need a Secret clearance to access SCI (Page 3). All other requirements can be waived (Para. 4b).

Page 1 - The sentence that recognizes "both the validity of

the requirements and the difficulty involved" is contradictory. The requirements are _not_ valid unless present or future ADP systems can comply with them.

Page 1 - If the NFIB member can employ exceptions to all but one requirement of the directive, there is an obvious question over whether a directive is necessary. The purpose of the directive should be stated.

Page 2 The paragraph on Policy refers to "minimum security requirements" which is used incorrectly.

Page 3 The emphasis in this directive on exceptions (almost half of the directive) is noteworthy.

Does the exemption (4b) have to be documented? How many systems are now exempted? All of them?

The attachment, Computer Security Regulation, is meaningless as requirements since systems can be exempted. There is the inconsistency of seemingly requiring Top Secret clearance and access approvals for all data processed in the System High Mode while actually personnel with a Secret clearance and no access approvals can access the data and comply with the directive.